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12
13 **UNITED STATES DISTRICT COURT**
14
15 **DISTRICT OF NEVADA**

16 ANDREI GRUIA, an individual

17 Case No. 2:18-cv-02107-JCM-CWH

18 Plaintiff,

19 vs.

20 EQUIFAX INFORMATION SERVICES,
21 LLC, a foreign limited-liability company;
22 EXPERIAN INFORMATION SOLUTIONS,
23 INC., a foreign corporation; TRANS UNION
24 LLC, a foreign limited-liability company;
25 BARCLAYS BANK DELAWARE, a foreign
corporation; BERLIN-WHEELER, INC., a
foreign corporation; CAPITAL ONE BANK
(USA), N.A., a national banking association;
CHASE BANK USA, N.A., a national banking
association; CITIBANK, N.A., a national
banking association; CONVERGENT
OUTSOURCING, INC., a foreign corporation;
DISCOVER BANK, a foreign corporation;
GRANT & WEBER, INC., a domestic
corporation; NRA GROUP, LLC dba
NATIONAL RECOVERY AGENCY, a
foreign limited-liability company; ONEMAIN
FINANCIAL SERVICES, INC., a foreign
corporation; SYNCHRONY BANK, a foreign
corporation; VERIZON WIRELESS
SERVICES, LLC, a foreign limited-liability
company; WEBBANK, a foreign corporation;
WELLS FARGO BANK, N.A., a national
banking association;

26 Defendants.

27
28 **STIPULATION AND ORDER TO
EXTEND DEFENDANT WELLS
FARGO BANK, N.A.'S TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

4821-3602-0346

1 It is hereby stipulated by and between Plaintiff Andrei Gruia ("Plaintiff"), through his
2 attorneys, Law Office of Kevin L. Hernandez, and Defendant Wells Fargo Bank, N.A. ("Wells
3 Fargo"), through its attorneys, the law firm of Snell & Wilmer L.L.P., as follows:

4 In the interest of conserving client and judicial resources, Plaintiff and Wells Fargo
5 stipulate and agree that Wells Fargo shall have an extension until **December 17, 2018**, in which
6 to respond to the Complaint. This is the parties' first request for an extension of time to respond
7 to the Complaint and is not intended to cause any delay or prejudice to any party, but is intended
8 so that Wells Fargo can conduct a diligent search and obtain records necessary to prepare its
9 response.

10 DATED this 14th day of November 2018.

11 LAW OFFICE OF KEVIN L. HERNANDEZ

12 _____
13 /s/ *Kevin L. Hernandez*
14 Kevin L. Hernandez (NV Bar No. 12594)
15 2510 Wigwam Parkway, Suite 206
16 Las Vegas, NV 89074
17 Telephone: (702) 563-4450
18 Facsimile: (702) 552-0408
19 Attorneys for Plaintiff Andrei Gruia

20 DATED this 14th day of November 2018.

21 SNELL & WILMER L.L.P.

22 _____
23 /s/ *Jennifer L. McBee*
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25 Jennifer L. McBee (NV Bar No. 9110)
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30 Attorneys for Defendant Wells Fargo Bank, N.A.

31 **ORDER**

32 **IT IS ORDERED THAT** Wells Fargo Bank, N.A.'s time to respond to Plaintiff's
33 Complaint shall be extended to on or before December 17, 2018.

34 **IT IS SO ORDERED.**

35 _____
36 *Craig H.*
37 UNITED STATES MAGISTRATE JUDGE

38 DATED: November 15, 2018.

39 Respectfully submitted by:

40 SNELL & WILMER L.L.P.

41 _____
42 /s/ *Jennifer L. McBee*

43 Kelly H. Dove (NV Bar No. 10569)
44 Jennifer L. McBee (NV Bar No. 9110)
45 3883 Howard Hughes Parkway, Suite 1100

46 Attorneys for Defendant Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DEFENDANT WELLS FARGO BANK, N.A.'S TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: November 14, 2018

An Employee of SNELL & WILMER L.L.P.

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